UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 15-10326-RGS
	)	
RUSSELL DINOVO	)	

ASSENTED MOTION TO RESCHEDULE RULE 11 HEARING

COMES NOW the Defendant, Russell Dinovo, by his court appointed attorney, Inga L. Parsons, and with the assent of the government by AUSA Suzanne Jacobs, the Defendant hereby moves this Court to reschedule the Rule 11 Hearing as follows:

1. Mr. Dinovo is scheduled for a Rule 11 Hearing on April 28, 2017.
2. Mr. Dinovo's counsel has family medical issues and needs to be out of town starting the week of March 24th and has out of state litigation the first two weeks of May.
3. The government has a two-week trial starting May 15th.
4. At present, the state motion for a new trial remains pending and defense counsel has been informed that the state judge does not require an in-person hearing and will rule on the papers.
5. It is hoped that the state court will decide within the month.
6. Both counsel have checked their availability and could attend a Rule 11 hearing on April 12th, April 13th or April 17th at the Court's convenience.
7. For other good and just cause.

WHEREFORE it is respectfully requested that the Rule 11 Hearing be rescheduled to April 12th, April 13th or April 17th at the Court's convenience.

Respectfully submitted,

/s/ *Inga L. Parsons*_______________

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CERTIFICATE OF SERVICE

I, INGA L. PARSONS, hereby certify that on March 14, 2017, I electronically served a copy of the foregoing document on the all registered participants of the CM/ECF System on the above-captioned matter:

/s/ *Inga L. Parsons*_______________

INGA L. PARSONS
Attorney for *Russell Dinovo*